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From: "David F. Kalb" <dackalb@erols.com>
To: A4.A4 (FCCINFO)
Date: 8/23/98 5:16pm
Subject: Docket 98-143, New Amateur Radio Licensing

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

98-143

Dear FCC:

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RE: Docket 98-143, dtd: 10 August 1998
FCC Notice of Proposed Rulemaking for Amateur Radio.

As a Tech Plus licensee would like to post my replies and comments to this proposal as follows:

1. Combining the license classes is fine. I am in foavor.
2. Raising the morse code bar as it is to operate in the HF spectrum from 5 words per minute to 13 per minute is criminal!
 - a. Other countries allow operation in the HF spectrum with only 6 words per minute test. Are you proposing to regulate other countries now as well; proposing a world wide change in the International Agreements, or are only punishing the American operators?
 - b. Most American services (Army, Coast Guard, Air Force since 1992) have stopped teaching morse code as a necessary job skill in the communications field. The Army has even eliminated the job field of morse code operators from its books!
 - c. The Coast Guard in 1996 has even stopped listening for morse code emergency traffic on the shipping frequencies.
 - d. In todays market one can buy a morse code reader or a computer program to send and receive the morse code without even having to mentally decipher it or even copy it down. These devices are good up to 60 words per minute.
3. I would like to see one morse code test (be it 5 or 6 words per minute) for entry into the HF spectrum and an increase in written questions on theory, operation, ect. A second level morse code test I will comment on later in this paper.
4. In this age of computers and techincal gadgets, I see no use in the *non-repeat* morse code testing proceedure. In real life you can always ask for a repeat and I know many conversations by voice where the information was asked for several times during the radio contact. Also in todays market one can buy a morse code reader or computer program to send and receive the morse code without even having to mentally decipher it. So what gives? Is the FCC still operating in the 1920*s?? Can't the FCC move into the 20th century? If you walk into a testing site you will see that the morse code test is given by a pretaped method, do you know why? Because most of the testers don't use morse code and can't send it at that speed (that*s what one of my testers stated for the class when I took my upgrade test!); the testers don't even use it.
5. I do not know where you get your results from; but, this Tech Plus operator uses 10 meters (HF band) 80 per cent of the time.
6. I am also in favor of allowing Novice and Tech Plus*s to operate CW anywhere on the bands and at any power level they desire. The 200 Watt power level restriction is laughable when you listen to the radio contacts between two Extra class licensees (my peers-who should be setting a proper example) and hear them admitt to transmitting at well over 1000 watts of power and you then find out that they are only 25 miles apart from one another!! With less than 90 watts I have made contacts from Maryland into Argentina and to the West Coast. Maybe the power restrictions should be on the higher classes of licenses who seem to forget the idea of only using only that power setting that is needed to make the contact...

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7. In my humble opinion, the only way to stop the use of doctors statements to get around the morse code testing at higher levels would be to only require morse code testing to use the morse code segments of the bands. As long as the morse code is tied into using the voice sections at higher license classes you will have this problem. 98% of the people only want the higher class of license to *talk*, not punch a key.

In closing I must leave with this comment: Currently the average age of operators on the amateur bands is over 55 years and ages each and every year. If we are to change that and live up to the reason that the bands were originally placed into effect so many years ago; namely, experimentation and as a means of keeping a pool of knowledgeable and experienced radio operators handy for national emergencies; we will need to change the way we view licensing, structuring, operating, testing, and even training in order to bring new and younger life onto the bands. After all is said and done, Amateur Radio is only a hobby and not a paid job; if the hobby is too costly to maintain or too hard to manage then it quickly ceases to be a hobby and becomes another failed waste of time and is quickly and quietly discarded for another...

Lets do a reality check and get with the program for a change.

David F. Kalb
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